

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10045-DPW
)	
LUIS RAMIREZ, A/K/A)	
"KING LITTLE PSYCHO",)	
Defendant.)	

JOINT STATUS REPORT

Pursuant to Local Rule 116.5(C), the parties are hereby jointly filing the following Status Report prepared in connection with the Initial Pre-Trial Conference scheduled for June 30, 2004.

1. Outstanding Discovery Issues

There are no outstanding discovery motions or issues.

2. Additional Discovery

No party anticipates producing any additional discovery, other than that required by the rules 21 days before trial.

3. Insanity/ Public Authority Defenses

The defendant does not intend to raise a defense of insanity or public authority.

4. Notice of Alibi

The government requested a Notice of Alibi in its Automatic Discovery Letter. No response has been received to that request.

5. Motions

The defendant does not anticipate filing any motions to suppress, to sever or to dismiss prior to trial but is reserving

his right to file other pretrial motions that could require a ruling by the District Court.

6. Early Case Resolution

It is too early to tell whether this case can be resolved short of trial.

7. Speedy Trial Act

The parties have conferred on the periods excludable from all Speedy Trial Act calculations and believe that the following periods are excludable:

2/26/04-3/11/04	Arraignment and Order on Excludable Time, dated 2/26/04
3/11/04-3/25/04	Order on Excludable Time, dated 2/26/04 (see footnote 1)
4/7/04-6/15/04	Order on Motion to Exclude Time, dated 4/16/04
6/18/04-6/29/04	Order of Motion to Exclude Time, dated June 22, 2004
6/30/04	Initial Pre-Trial Conference Held

As of the Initial Pre-Trial Conference, 14 days will have been counted and 56 days will remain under the Speedy Trial Act.

9. Length of Trial

In the event that a trial is required, the parties estimate that it will last approximately 2-3 days.

10. Other Matters

The defendant is in custody and requires a Spanish Interpreter.

Respectfully submitted,

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